

# EXHIBIT A.4

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE GOULD AND WALDMAN PLAINTIFFS’  
SECOND REQUEST TO PRODUCE DOCUMENTS AND THINGS  
(Nos. 6-13)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Shayna Eileen Gould, Ronald Allan Gould, Elise Janet Gould, Jessica Rine, Shmuel Waldman, Henna Novack Waldman, Morris Waldman and Eva Waldman (“Plaintiffs”), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs’ counsel within 30 days of the service of these requests.

**INSTRUCTIONS AND GENERAL DEFINITIONS**

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

**SPECIFIC DEFINITIONS**

1. “PA” means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. “PA Martyr Form and File” in respect to any deceased or injured person, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Social Affairs, or any predecessor or successor entity thereto. The documents produced by defendants as Bates 02:006827-34 are an illustrative example of a PA Martyr Form and File.

5. “PA Prisoner Form and File” in respect to any person who is or was a prisoner, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Prisoner Affairs, or any predecessor or successor entity thereto. The existence of PA Prisoner Forms and Files was confirmed in the deposition of Jawad Amawi in the matter of *Klieman v. Palestinian Authority* at pp. 51; 64.

6. “PLO Martyr File” in respect to any deceased or injured person, means and refers to the complete paper file from the PLO’s Social Affairs Institution, or any predecessor or successor entity thereto. The existence of PLO Martyr Files is evidenced by the document produced by defendants in the matter of *Gilmore v. Palestinian Authority* as Bates 06:000086.

7. “PSS” means and refers to the PA’s Preventive Security Service.

8. “GIS” means and refers to the PA’s General Intelligence Service.

9. “NSF” means and refers to the PA’s National Security Forces.

10. “MI” means and refers to the PA’s Military Intelligence.

11. “Force 17” means and refers to PA’s Presidential Security Force.

12. “PAP” means and refers to the PA’s civil police force.

13. The “Terrorist Attack” means and refers to the January 22, 2002, terrorist shooting attack from which the Plaintiffs’ action arises.

**REQUESTS FOR DOCUMENTS AND THINGS**

6. All documents concerning the Terrorist Attack, including without limitation:

i. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PSS.

ii. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the GIS.

iii. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the NSF.

iv. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the MI.

v. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of Force 17.

vi. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PAP.

7. All documents concerning Said Ramadan (“Ramadan”), including without limitation:

i. The complete personnel files for Ramadan from all positions and jobs held by Ramadan in the PA and/or PLO and from all work and employment performed by Ramadan for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Ramadan in the PA and/or PLO and of all

work and employment performed by Ramadan for the PA and/or PLO, between January 1, 2000 and the date of his death; (ii); the rank or ranks held by Ramadan between January 1, 2000 and the date of his death, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Ramadan held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Ramadan between January 1, 2000 and the date of his death.

iv. All documents concerning all payments made and all benefits provided to Ramadan's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Ramadan's death, including without limitation the PA Martyr Form and File, and the PLO Martyr File, concerning Ramadan.

v. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Ramadan in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Ramadan.

8. All documents concerning Majid Al-Masri ("Al-Masri"), including without limitation:

i. The complete personnel files for Al-Masri from all positions and jobs held by Al-Masri in the PA and/or PLO and from all work and employment performed by Al-Masri for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Al-Masri in the PA and/or PLO and of all work and employment performed by Al-Masri for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Al-Masri between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Al-Masri held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Al-Masri between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Al-Masri and/or Al-Masri's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Al-Masri's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Al-Masri.

v. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Al-Masri in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Al-Masri, including without limitation a complete copy of the broadcast referenced in the document disclosed to defendants by plaintiffs by email at 11:58 AM on November 19, 2012, and a complete copy of the broadcast portions of which were contained in the audiovisual file disclosed to defendants by plaintiffs by email at 11:55 AM on November 19, 2012.

9. All documents concerning Ahmed Taleb Mustapha Barghouti ("Barghouti"), including without limitation:

i. The complete personnel files for Barghouti from all positions and jobs held by Barghouti in the PA and/or PLO and from all work and employment performed by Barghouti for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Barghouti in the PA and/or PLO and of all work and employment performed by Barghouti for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Barghouti between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time

periods during which Barghouti held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Barghouti between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Barghouti and/or Barghouti's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Barghouti's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Barghouti.

v. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Barghouti in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Barghouti.



10. All documents concerning Mohammed Abdel Rahman Salam Maslah (or “Maslah”) (a/k/a “Abu Satha”) (hereinafter: “Maslah”), including without limitation:

i. The complete personnel files for Maslah from all positions and jobs held by Maslah in the PA and/or PLO and from all work and employment performed by Maslah for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Maslah in the PA and/or PLO and of all work and employment performed by Maslah for the PA and/or PLO, between January 1, 2000 and today; (ii) the rank or ranks held by Maslah between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Maslah held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Maslah between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Maslah and/or Maslah’s relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Maslah’s imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Maslah.

v. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Maslah in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Maslah.

11. All documents concerning Nasser Aweis ("Aweis"), including without limitation:

i. The complete personnel files for Aweis from all positions and jobs held by Aweis in the PA and/or PLO and from all work and employment performed by Aweis for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Aweis in the PA and/or PLO and of all work and employment performed by Aweis for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Aweis between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Aweis held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Aweis between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Aweis and/or Aweis's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Aweis's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Aweis.

v. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Aweis, including without limitation a complete copy of the broadcast portions of which were contained in the audiovisual file disclosed to defendants by plaintiffs by email on November 17, 2012 at 7:00 PM.

12. All documents concerning Faras Sadak Mohammed Ghanem ("Ghanem"), including without limitation:

i. The complete personnel files for Ghanem from all positions and jobs held by Ghanem in the PA and/or PLO and from all work and employment performed by Ghanem for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Ghanem in the PA and/or PLO and of all work and employment performed by Ghanem for the PA and/or PLO, between January 1,

2000 and today; (ii); the rank or ranks held by Ghanem between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Ghanem held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Ghanem between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Ghanem and/or Ghanem's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Ghanem's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Ghanem.

v. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of the GIS.

vii. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of the NSF.

viii. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of the MI.

ix. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of Force 17.

x. All documents concerning Ghanem in the paper, computerized, electronic or other files or archives of the PAP.

xi. All broadcasts on PA TV concerning Ghanem.

13. All documents concerning Mohammed Sami Ibrahim Abdullah (“Abdullah”), including without limitation:

i. The complete personnel files for Abdullah from all positions and jobs held by Abdullah in the PA and/or PLO and from all work and employment performed by Abdullah for the PA and/or PLO, at any time.

ii. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Abdullah in the PA and/or PLO and of all work and employment performed by Abdullah for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Abdullah between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Abdullah held and provided such positions, jobs, work and employment.

iii. All documents concerning all payments made by the PA and/or PLO to Abdullah between January 1, 2000 and today.

iv. All documents concerning all payments made and all benefits provided to Abdullah and/or Abdullah’s relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Abdullah’s imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Abdullah.

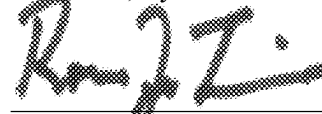
v. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of the PSS.

vi. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of the GIS.

- vii. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of the NSF.
- viii. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of the MI.
- ix. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of Force 17.
- x. All documents concerning Abdullah in the paper, computerized, electronic or other files or archives of the PAP.
- xi. All broadcasts on PA TV concerning Abdullah.

November 21, 2012

Plaintiffs, by their Attorney,



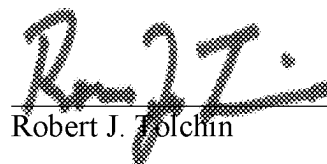
Robert J. Tolchin  
111 Livingston Street, Suite 1928  
Brooklyn, New York 11201  
(718) 855-3627  
Fax: (718) 504-4943  
[RJT@tolchinlaw.com](mailto:RJT@tolchinlaw.com)

David I. Schoen  
David I. Schoen, Attorney at Law  
2800 Zelda Road, Suite 100-6  
Montgomery, Alabama 36106  
(334) 395-6611  
[DSchoen593@aol.com](mailto:DSchoen593@aol.com)

**CERTIFICATION**

I hereby certify that on November 21, 2012, I caused the within to be served by electronic mail and by hand on the counsel listed below:

Brian A. Hill  
MILLER & CHEVALIER CHARTERED  
655 15th Street, NW, Suite 900  
Washington D.C. 20005-6701

  
Robert J. Tolchin